## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

: In re: : Chapter 11

FTX TRADING LTD., *et al.*, 1 : Case No. 22-11068 (KBO)

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Debtors. : (Jointly Administered)

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## NOTICE OF DEPOSITION OF THE FTX RECOVERY TRUST PURSUANT TO FED. R. CIV. P. 30(b)(6)

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, made applicable to this matter by Rules 7026, 7030, and 9014(c) of the Federal Rules of Bankruptcy Procedure, Russell Crumpler and Christopher Farmer, in their joint capacities as the duly authorized foreign representatives and joint liquidators (the "Joint Liquidators") of Three Arrows Capital, Ltd., by and through their undersigned counsel, will take the deposition of the FTX Recovery Trust and FTX Trading Ltd. and its debtor affiliates, on September 9, 2025 at 9:00 a.m. prevailing Eastern Time, at the offices of Latham & Watkins LLP, 1271 Avenue of the Americas, New York, NY 10020, or at such other date, time, and location that is agreed on by the parties.

The deposition will be taken before a person authorized to administer oaths and will be recorded by videographic and/or stenographic means. Testimony will be taken for purposes of discovery relating to the *Amended Proof of Claim Filed by the Joint Liquidators of Three Arrows* 

<sup>&</sup>lt;sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the FTX Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

Capital Ltd (Claim No. 100078), including the Attachment and all Exhibits thereto, and the Objection of the FTX Recovery Trust to the Amended Proof of Claim Filed by the Joint Liquidators of Three Arrows Capital Ltd. [D.I. 30932], including all declarations, exhibits, and annexes submitted in support thereof, and for any other permissible purposes. The Joint Liquidators reserve the right to take additional depositions of the FTX Recovery Trust, the Debtors, and any of their parents, subsidiaries, affiliated entities, partners, members, agents, advisors, directors, officers, experts, or employees, and to seek additional discovery from the FTX Recovery Trust, the Debtors, and any other parties relating to the above-captioned chapter 11 cases or any other matters.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the FTX Recovery Trust shall designate one or more officers, directors, managing agents, or persons who consent to testify on its behalf regarding each of the Topics for Examination set forth in **Exhibit A**, in accordance with the Definitions set forth therein. The Joint Liquidators request that the FTX Recovery Trust provide written notice, at least seven (7) days in advance of the deposition noticed hereby, of: (1) the name(s) of each designee of the FTX Recovery Trust; (2) the job title of each such person; and (3) the Topics for Examination set forth in Exhibit A on which each such person will testify.

Dated: August 26, 2025 Wilmington, Delaware

## /s/ Alexis R. Gambale

Christopher Harris (admitted *pro hac vice*) Adam J. Goldberg (admitted *pro hac vice*) Zachary F. Proulx (admitted *pro hac vice*) Nacif Taousse (admitted *pro hac vice*)

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